



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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March 15, 2005

Federal Communication Commission
445 12th Street, Southwest
Washington, DC 20554

Re: WT Docket No. 04-435
Amendment of the Commission's Rules to Facilitate the Use of Cellular
Telephones and other Wireless Devices Aboard Airborne Aircraft.

Dear Sirs:

On behalf of over 400,000 active general aviation pilots, the Aircraft Owners and Pilots Association (AOPA) supports the Federal Communication Commission (FCC) proposal to permit the use of cellular telephones and other wireless devices aboard general aviation aircraft. AOPA members utilize more than 200,000 general aviation aircraft for personal transportation and allowing the use of cellular telephones provides benefits in the form of increased access to information.

Giving general aviation pilots the ability to use wireless communication networks in-flight provides a valuable tool for obtaining updated weather and other information that enhances safety.

The risk of interference with aircraft avionics is minimal due to the aircraft size, seating capacity and the type of operations conducted by general aviation aircraft. Pilots are authorized to determine when the use of portable electronic devices can be safely used onboard the aircraft. All licensed pilots are trained and tested on their knowledge of aviation regulations pertaining to portable electronic devices.

The typical general aviation aircraft has six seats or less, meaning that even if operated at full capacity, the number of mobile communication devices that could potentially impact onboard electronics is limited. In addition, the pilot is not isolated from the passengers. Should electronic interference be an issue the pilot has the immediate authority and responsibility to terminate the use of the device at any time.

Because the majority of general aviation operations are conducted under Visual Flight Rules (VFR), exclusive reliance upon electronic navigation seldom occurs.

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Pilots usually deploy multiple navigation methods including highly accurate aeronautical charts made of paper. Additionally, pilots operating VFR outside of positively controlled airspace are not required to maintain constant communications with air traffic control or any other agency.

The change to the FCC regulations is strongly supported by AOPA. The benefits will directly support safety and the communication of important information. Interference mitigation strategies are already in use and pilots are already trained as to how to handle the interference of a portable electronic device. AOPA requests that the FCC accelerate the rulemaking process, or publish interim guidance that immediately permits general aviation aircraft with the opportunity to now utilize all cellular telephones and other wireless devices aboard airborne aircraft.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Randy Kenagy'.

Randy Kenagy
Sr. Director Advanced Technology
Government and Technical Affairs